

Hearing Date: October 25, 2016 at 10:00 a.m. (ET)
Objection Deadline: October 18, 2016 at 4:00 p.m. (ET)

COLE SCHOTZ P.C.

Ilana Volkov, Esq.
Mark Tsukerman, Esq.
1325 Avenue of the Americas, 19th Floor
New York, New York 10019
Telephone: (212) 752-8000
Facsimile: (212) 752-8393

Counsel for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
:
In re: : Chapter 11
:
NICHOLAS G. A. DENTON, : Case No. 16-12239 (SMB)
:
Debtor.¹ :
:
-----x

**NOTICE OF DEBTOR'S APPLICATION FOR AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
BRANNOCK & HUMPHRIES AS SPECIAL LITIGATION
COUNSEL NUNC PRO TUNC TO THE PETITION DATE**

PLEASE TAKE NOTICE that a hearing (the “**Hearing**”) on the Application (the “**Application**”) of the above-captioned debtor and debtor in possession (the “**Debtor**”) for entry of an order authorizing the Debtor to retain and employ Brannock & Humphries as special litigation counsel *nunc pro tunc* to the Petition Date, will be held before the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the “**Court**”), in Room 723, One Bowling Green, New York, New York 10004-1408, on **October 25, 2016 at 10:00 a.m. (ET)**.

¹ The last four digits of the Debtor's social security number are 1234.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Application and the relief requested therein, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **October 18, 2016 at 4:00 p.m. (ET)** (the "**Objection Deadline**"), upon: (i) counsel for the Debtor, Cole Schotz P.C., 1325 Avenue of the Americas, 19th Floor, New York, NY 10019, Attn: Ilana Volkov (ivolkov@coleschotz.com) and Mark Tsukerman (mtsukerman@coleschotz.com); and (ii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are timely filed and served with respect to the Application, the Debtor may, on or after the Objection Deadline, submit to the Court an order substantially in the form attached as **Exhibit A** to the Application, which order the Court may enter with no further notice or opportunity to be heard.

Dated: October 5, 2016

/s/ Ilana Volkov, Esq.
Ilana Volkov, Esq.
Mark Tsukerman, Esq.
COLE SCHOTZ P.C.
1325 Avenue of the Americas, 19th Floor
New York, New York 10019
Telephone: (212) 752-8000
Facsimile: (212) 752-8393